

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

THE UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN R. BOLTON,

Defendant.

Civil Action No. 20-1580-RCL

**MOTION FOR EXTENSION OF TIME**

Defendant John R. Bolton respectfully moves the Court for a one-week extension of time within which to respond to the United States' Amended Complaint. The United States' Complaint was served on June 18, and Plaintiff served an Amended Complaint the following day, on June 19. Under FED. R. CIV. P. 12 and 15(a)(3), Ambassador Bolton's responsive pleading or motion is currently due on July 9. Defendant seeks an additional week, until and including July 16, to respond to the Amended Complaint. Pursuant to LCvR 7(m), Defendant's counsel states that he twice consulted with counsel for the United States, Mr. Morrell, asking initially if Plaintiff would consent to a two-week extension of time to file Defendant's response, and when that request was declined, asking if the Plaintiff would consent to a one-week extension, which was also declined. In support of his request, Defendant states as follows:

1. Defendant's lead counsel in this matter is also lead counsel of record in *Virginia Uranium v. Commonwealth*, No. CL15-623 (Va. Cir. Ct.), which is set for a week-long bench trial in Wise, Virginia during July 6–10. The other attorneys on Ambassador Bolton's legal team, Mr. Kirk and Mr. Ohlendorf, also constitute the trial team in *Virginia Uranium*. Both of them are currently heavily engaged in pre-trial preparations, and have been for the past several weeks, and they will be in Wise for the entirety of the week of July 6th, trying the case.

2. In addition to the week-long trial in *Virginia Uranium*, Defendant's attorneys are also consumed with commitments in several other pending matters. Mr. Cooper and Mr. Kirk also represent the plaintiffs in *McCarthy v. Pelosi*, No. 20-cv-1395 (D.D.C), which is pending before Judge Contreras, and they are currently engaged in drafting a reply to the Defendants' motion to dismiss in that case, which is due on July 3, and in preparing for a hearing on the Plaintiffs' motion for a preliminary injunction, which is set to take place on July 24. Further, Mr. Cooper and Mr. Kirk also represent the plaintiff in *Geo Group, Inc. v. Newsome*, 19-cv-2491 (S.D. Cal.), and much of their time in the coming weeks will be consumed with preparing for a preliminary injunction hearing in that matter, which is scheduled for July 16. Further still, Mr. Cooper represents the Plaintiff-Appellant in *Rahimi v. Rite Aid Corp.*, No. 20-1063 (6th Cir.), and he is assisting in preparing the opening brief in that case, which is due on July 17th. Finally, Mr. Cooper also represents the Defendant-Appellant in *Jones v. DeSantis*, No. 20-12003 (11th Cir.), and he will be additionally engaged during the month of July in the preparation of Appellant's reply brief in that appeal, which is due on July 29th.

3. Plaintiff has offered no reason for declining the requested one-week extension, and it does not appear that Plaintiff would be prejudiced if the extension is granted. Plaintiff's request for emergency injunctive relief is no longer pending. And given the nature of the remedies it is currently seeking, if it ultimately prevails on the merits of its claims, the United States will be no worse off because the litigation took one additional week.

4. Given Defendant's Counsel's deadlines and commitments over the coming weeks, several of which are in matters that are highly time-sensitive, and the lack of any apparent prejudice to Plaintiff, Defendant submits that there is good cause for a modest, one-week extension of the deadline for his response to the United States' amended complaint.

July 2, 2020

Respectfully submitted,

/s/ Charles J. Cooper

Charles J. Cooper, Bar No. 248070

Michael W. Kirk, Bar No. 424648

John D. Ohlendorf, Bar No. 1024544

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*Counsel for Defendant John R. Bolton*

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**[PROPOSED] ORDER**

Pending before the Court is Defendant's motion for a one-week extension of time within which to file a pleading or motion responding to Plaintiff's Amended Complaint. The United States opposes the Motion. Upon consideration of the motion, and for good cause shown, Defendant's motion is **GRANTED**. Defendant's responsive pleading or motion shall be filed on or before July 16, 2020.

**SO ORDERED.**

Dated: \_\_\_\_\_

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HONORABLE ROYCE C. LAMBERTH  
United States District Court Judge